

1 **SAO**

2 JEFFREY I. PITEGOFF, ESQ.

3 Nevada Bar No. 005458

4 MORRIS, SULLIVAN, LEMKUL & PITEGOFF, LLP

5 3770 Howard Hughes Parkway, Suite 170

6 Las Vegas, Nevada 89169

7 Telephone No. (702) 405-8100

8 Fax No. (702) 405-8101

9 *Attorney for Defendants*

10

11 **UNITED STATES DISTRICT COURT**

12 **STATE OF NEVADA**

13 THOMAS W. FINN, an individual,

14 Plaintiff,

15 vs.

16 CITY OF BOULDER CITY, a political
17 subdivision of the STATE OF NEVADA;
18 DAVE OLSEN, individually and in his
19 capacity as City Attorney of Boulder City;
20 ROGER ROBLER, individually and in his
21 capacity as Mayer of Boulder City; CAM
22 WALKER, ROD WOODBURY, PEGGY
23 LEAVITT, and DUNCAN MCCOY,
24 individually and in their capacities as City
25 Councilmembers,

26 Defendants.

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28 CASE NO: 2:14-cv-01835-JAD-GWF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE A
RESPONSIVE PLEADING TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

(First Request)

Date Requested: July 20, 2015

20 COMES NOW, Plaintiff THOMAS W. FINN, by and through his attorney of record,
21 Sean P. Flanagan, Esq., of Flanagan Ltd., and Defendants CITY OF BOULDER CITY, a
22 political subdivision of the STATE OF NEVADA; DAVE OLSEN, individually and in his
23 capacity as City Attorney of Boulder City; ROGER ROBLER, individually and in his capacity as
24 Mayor of Boulder City; CAM WALKER, ROD WOODBURY, PEGGY LEAVITT, and
25 DUNCAN MCCOY, individually and in their capacities as City Councilmembers, by and
26 through their attorney of record, JEFFREY I. PITEGOFF, ESQ. of Morris, Sullivan, Lemkul &
27 Pitegoff, LLP., hereby stipulate and agree that Defendants be allowed up to and including **July
28 20, 2015** to file their responsive pleadings to Plaintiff's First Amended Complaint in the above-

1 captioned matter. The parties are requesting this extension of time because they are currently in
2 negotiation to dismiss certain claims in this case, such as the Age Discrimination Act.
3 Furthermore, Defendant's counsel is currently involved in a series of depositions due to
4 conflicting vacation schedules.

5

6 DATED this 10th day of July, 2015

7 MORRIS, SULLIVAN, LEMKUL
8 & PITEGOFF , LLP

FLANAGAN, LTD

9 /s/ Jeffrey I. Pitegoff

10 Jeffrey I. Pitegoff, Esq.
Nevada Bar Number 5458
3770 Howard Hughes Pkwy. Ste 170
11 Las Vegas, NV 89169
(702) 405-8100
12 Attorney for Defendants

/s/ Sean Flanagan

Sean P. Flanagan, Esq.
Nevada Bar Number 5304
7251 West Lake Mead Blvd., Ste. 300
Las Vegas, NV 89128
Tel: (702) 562-4111
13 Attorney for Plaintiff

14 IT IS HEREBY ORDERED that Defendants are allowed up to and including July 20,
15 2015 to file their responsive pleadings to Plaintiff's Complaint in the above-captioned matter.

16 DATED this 13th day of July _____, 2015

17 
18 UNITED STATES DISTRICT COURT JUDGE

19
20
21
22 DATED this 10th day of July 2015.

23 MORRIS, SULLIVAN, LEMKUL &
24 PITEGOFF, LLP

25 /s/Jeffrey Pitegoff
26 JEFFREY I. PITEGOFF, ESQ.
Nevada Bar No. 005458
27 3770 Howard Hughes Parkway, Suite 170
Las Vegas, NV 89169
28 Attorney for Defendants